

## LAW OFFICES

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RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
SALVATORE TAILLEFER

June 25, 2014

ARTHUR BLOOSTON  
1914 - 1999

## AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
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LEGISLATIVE CONSULTANTEUGENE MALISZEWSKYJ  
ENGINEERING CONSULTANT

## WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com  
202-828-5562REDACTED - FOR PUBLIC INSPECTION*VIA HAND DELIVERY*Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

ACCEPTED/FILED

JUN 25 2014

Federal Communications Commission  
Office of the SecretaryRE: Form 481 - Carrier Annual Reporting Data Collection, 2014  
WC Dockets No. 14-58, 10-90 and 11-42

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,<sup>1</sup> Peñasco Valley Telephone Cooperative, Inc. (PVT) hereby submits a copy of its "FCC Form 481 - Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,<sup>2</sup> PVT requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. PVT also requests confidential treatment for its Five Year Service Quality

<sup>1</sup> 47 CFR §§54.313 and 54.422.<sup>2</sup> *In the Matter of Connect America Fund, et al.*, PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of PVT's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', with a stylized, flowing script.

Salvatore Taillefer, Jr.

Counsel to Peñasco Valley  
Telephone Cooperative, Inc.

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau  
Mr. Jay Umphlett, Peñasco Valley Telephone Cooperative, Inc.

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VIA HAND DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Form 481 - Carrier Annual Reporting Data Collection, 2014  
WC Dockets No. 14-58, 10-90, and 11-42

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Peñasco Valley Telephone Cooperative, Inc. ("PVT"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, PVT requests confidential treatment of the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, PVT states the following:

1. *Identification of the specific information for which confidential treatment is sought.*

PVT seeks confidential treatment of the Five Year Service Quality Improvement Plan, attachment 492270NM112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about PVT as well as information about PVT's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

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**JUN 25 2014**

Federal Communications Commission  
Office of the Secretary



2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors,"<sup>1</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.<sup>2</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by PVT that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to PVT because the confidential information could provide competitors with commercially sensitive insights related to PVT's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

PVT does not make the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

PVT does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

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<sup>1</sup> *Id.* § 0.457(d)(2).

<sup>2</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as PVT will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, PVT requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', written over a horizontal line.

Salvatore Taillefer, Jr.

Counsel for

Peñasco Valley Telephone Cooperative, Inc.

FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2012
---	--	--

<010> Study Area Code 492270  
 <015> Study Area Name PENASCO VALLEY TEL  
 <020> Program Year 2015  
 <030> Contact Name: Person USAC should contact with questions about this data Jay Umphlett  
 <035> Contact Telephone Number: 5757481241 ext. 2270  
 Number of the person identified in data line <030>  
 <039> Contact Email Address: jumphlett@pvt.com  
 Email of the person identified in data line <030>

**ACCEPTED/FILED**  
**JUN 25 2014**

**Federal Communications Commission  
 Office of the Secretary**

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 492270NM510.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 492270NM610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> 492270NM1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet</b>			
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



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(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no )	<input type="radio"/> <input checked="" type="radio"/>
If your answer to Line <110> is yes, do you have an existing §54.202(a) "5			
<111>	year plan" filed with the FCC?	(yes / no )	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

492270NM112.docx

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<div style="border: 1px solid black; width: 40px; height: 110px; margin: 0 auto;"></div>
<114>	Report how much universal service (USF) support was received	
<115>	How (USF) was used to improve service quality	
<116>	How (USF) was used to improve service coverage	
<117>	How (USF) was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]



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(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

[illegible]

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com
<810>	Reporting Carrier	Penasco Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	Penasco Valley Telephone Cooperative, Inc.

[illegible]



# REDACTED - FOR PUBLIC INSPECTION

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

JULY 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<910> Tribal Land(s) on which ETC Serves

Mescalero Apache

<920> Tribal Government Engagement Obligation

492270NM920.pdf

<921>

<922> Feasibility and sustainability planning;  
 <923> Marketing services in a culturally sensitive manner;  
 <924> Compliance with Rights of way processes  
 <925> Compliance with Land Use permitting requirements  
 <926> Compliance with Facilities Siting rules  
 <927> Compliance with Environmental Review processes  
 <928> Compliance with Cultural Preservation review processes  
 <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)
NA
NA
NA
NA
NA
NA
NA
NA

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REDACTED - FOR PUBLIC INSPECTION

<b>(1100) No Terrestrial Backhaul Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

Please check this box to confirm no terrestrial backhaul  
 <1120> options exist within the supported area pursuant to § 54.313(G)
 ☐

Please check this box to confirm the reporting carrier offers  
 <1130> broadband service of at least 1 Mbps downstream and 256 kbps  
 upstream within the supported area pursuant to § 54.313(G)
 ☐

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(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

492270NM1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP [www.pvt.com](http://www.pvt.com)

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

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REDACTED - FOR PUBLIC INSPECTION

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3080-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification (47 CFR § 54.313(b)(1)) ☐

<2011> 3rd Year Certification (47 CFR § 54.313(b)(2)) ☐

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012> 2013 Frozen Support Certification ☐

<2013> 2014 Frozen Support Certification ☐

<2014> 2015 Frozen Support Certification ☐

<2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017> 3rd year Broadband Service Certification ☐

<2018> 5th year Broadband Service Certification ☐

<2019> Interim Progress Certification ☐

<2020> ☐

<2021> Interim Progress Community Anchor Institutions ☐

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

# REDACTED - FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB's Control No. 3060-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011)



(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)



(3014) If yes, does your company file the RUS annual report

(Yes/No)



(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)



(3016)



(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

492270NM3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)



If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications



(3020)



(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.



If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,



(3023) Underlying information subjected to a review by an independent certified public accountant



(3024) Underlying information subjected to an officer certification.



(3025)



(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

<b>Certification - Reporting Carrier</b> <b>Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PENASCO VALLEY TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/25/2014
Printed name of Authorized Officer: Kevin Bartley	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 5757481241 ext.	
Study Area Code of Reporting Carrier: 492270	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: ext. _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
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REDACTED - FOR PUBLIC INSPECTION

### **Attachments**

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

PEÑASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 112: FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

492270NM112

**REDACTED IN ENTIRETY**

REDACTED - FOR PUBLIC INSPECTION



492270NM510

### **Service Quality Standards and Consumer Protection Rules**

New Mexico statutes specifically exempt rural ILECs, such as Peñasco Valley Telephone Cooperative, Inc. (PVT), from Service Quality Standards and Consumer Protection regulations. Nevertheless, PVT does comply with the quality of service standards for large and midsize ILECs as specified in NM Title 17, Chapter 11, Parts 22 and 24 regarding reporting requirements, service standards, outages and provision of service during maintenance and emergencies, and with the consumer protection rules listed in NM Title 17, Chapter 11, Part 16 regarding disconnection of basic local exchange service and allocation of partial payments, customer complaint tracking, access to service and rate information, fair marketing practices, billing disputes, discontinuance of service, payment plans, restoration of service and customer deposits.

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492270NM610

**FCC Emergency Functioning**

Peñasco Valley Telephone Cooperative, Inc., (PVT) has battery backup at all central offices, remote offices and electronic digital loop carrier sites. All of these sites are also either equipped with a standby generator or a connection for a portable generator. The portable generators are stored at various locations within PVT's service area so they can be deployed quickly as needed. All batteries are tested yearly and all standby generators are tested weekly.

PVT has planned for network issues by establishing alternate toll routes, and where possible, establishing fiber rings between our main host central office and our remote offices. The majority of PVT's toll traffic and interconnection trunks utilize a collapsed ring fiber segment from the Cottonwood host central office north to Century-Link in Roswell, NM. PVT also has a separate toll route going southeast to the Hobbs, NM AT&T point of presence, which also allows PVT to manage traffic spikes in emergency situations. PVT's SS7 signaling links are split between these two toll routes along with our long distance trunks so that a single fiber cut, even on our main fiber route cannot take us completely down and isolate our network. The interoffice fiber routes between PVT exchanges are all configured on collapsed rings. This provides equipment protection (dual interfaces) on the transport equipment, however, all of the signals travel in the same fiber jacket. A complete fiber cut on one of these routes in most cases will isolate that office so that calling inside the exchange is possible, but customers will not be able to place calls out of the local calling area.

PVT currently has 3 diverse paths for all of the broadband traffic. If one path goes down, the traffic can be switched over to another path.

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REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

1/1/2014

[illegible]

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<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com
<810>	Reporting Carrier	Penasco Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	Penasco Valley Telephone Cooperative, Inc.

[illegible]